

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>v.</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>SOPHEAVY SAR</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1029(b)(2) (conspiracy to</b>
	<b>:</b>	<b>commit access device fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1028A (aggravated identity</b>
	<b>:</b>	<b>theft - 1 count)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Best Buy Co., Inc., Richfield, Minnesota, operated Best Buy retail stores, which purchased and sold merchandise, including computers, televisions and other electronic products, throughout the United States, including various locations in the Philadelphia, Pennsylvania area.

2. From in or about November 6, 2008, to in or about November 15, 2008, in the Eastern District of Pennsylvania, defendant

**SOPHEAVY SAR**

conspired and agreed, together and with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud, use and traffic in one or more counterfeit and unauthorized access devices, that is store accounts in the names of other persons, to obtain anything of value aggregating \$1000 or more

during a one year period, in violation of Title 18, United States Code, Section 1029(a)(2).

### **MANNER AND MEANS**

It was part of the conspiracy that:

3. Person Number 1 known to the United States Attorney (Person No. 1) obtained the names, addresses, social security numbers and dates of birth of R.S. and other victims, without their knowledge and consent, from Person Number 2 known to the United States Attorney (Person No. 2) and others unknown to the United States Attorney.

4. Person No. 1 used the names and identifying information of the victims to obtain counterfeit driver's licenses which were in the names of those victims, but which contained the photograph of defendant SOPHEAVY SAR, and others known and unknown to the United States Attorney.

5. At the direction of Person No. 1, defendant SOPHEAVY SAR and others known and unknown to the United States Attorney applied for lines of credit by completing applications at different stores, including the Best Buy in Willow Grove, Pennsylvania, using the names, addresses, social security numbers and dates of birth of victims that had been provided to them by Person No. 1, and by using as identification the counterfeit driver's licenses in the names of those victims, which had also been provided to them by Person No. 1.

6. At the direction of Person No. 1, Person Number 3 known to the United States Attorney (Person No. 3), an employee at the Best Buy in Willow Grove, assisted defendant SOPHEAVY SAR, and others known and unknown to the United States Attorney, in opening lines of credit and selecting merchandise.

7. At the direction of Person No. 1, defendant SOPHEAVY SAR and others

known and unknown to the United States Attorney paid for merchandise using accounts they had obtained using the identities of others, without the authorization or knowledge of those persons.

### **OVERT ACTS**

In furtherance of the conspiracy, defendant SOPHEAVY SAR, Person No. 1, Person No. 2, Person No. 3 and others known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about November 11, 2008, by text message, Person No. 1 obtained the name, address, social security number and date of birth of R.S., without her knowledge or consent, from Person No. 2.

2. On or about November 14, 2008, Person No. 1 informed defendant SOPHEAVY SAR that Person No. 1 had to re-make a counterfeit driver's license for defendant SAR, because Person No. 1 had mistakenly used the wrong height on the driver's license.

3. On or about November 15, 2008, Person No. 1 provided defendant SOPHEAVY SAR a counterfeit driver's license in the name of R.S., but with the picture of defendant SAR.

4. On or about November 15, 2008, at the direction of Person No. 1, with the assistance of Person No. 3, at the Best Buy in Willow Grove, Pennsylvania, defendant SOPHEAVY SAR applied for a line of credit in the name of victim R.S., without the knowledge or consent of R.S. Defendant SOPHEAVY SAR used the counterfeit driver's license in the name of R.S., which had been supplied to her by Person No. 1, as identification during the application process.

5. On or about November 15, 2008, at the Best Buy in Willow Grove,

Pennsylvania, at the direction of Person No. 1, and with the assistance of Person No. 3, defendant SOPHEAVY SAR used the line of credit she had opened in the name of R.S. to purchase merchandise valued at approximately \$3,908.41, without the knowledge or consent of R.S.

All in violation of Title 18, United States Code, Section 1029(b)(2).

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about November 15, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**SOPHEAVY SAR**

knowingly and without lawful authority possessed and used a means of identification of another  
person, that is, the name of R.S., during and in relation to access device fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(4).

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**MICHAEL L. LEVY  
UNITED STATES ATTORNEY**